

DECLARATION OF BRYCE WILBANKS
Pursuant to 28 U.S.C. § 1746

I, Bryce Wilbanks, have personal knowledge of the facts and matters set forth below. If called as a witness, I could and would testify as follows:

1. My name is Bryce Wilbanks. I am over the age of 18 and reside in Camden, Tennessee.
2. In approximately late 2023, I found a company called FBA Machine that could manage a third-party e-commerce store for me so that I could make some additional income. For several months I spoke with a salesperson named Wes. I spoke with him through email and over Google meet. Wes showed me a spreadsheet that could be manipulated to show how much my store could make in revenue and profit, depending on how much inventory I purchased. The sales projection showed that I could make \$3400 in profit if I put in \$1500 for inventory.
3. I was taking my time deciding on what to do and was skeptical of the business. Wes had me speak with Steven, the CEO of FBA Machine. Steven went over the profit spreadsheet with me and showed me how much I could make per month depending on how much I paid FBA Machine.
4. Wes also showed me video testimonials. One was from an NFL player who backed the business. This made me trust the company.
5. Wes asked me how much I could spend, and I told him that I could spend \$10,000 max for everything—the initial fee and any inventory. Wes told me that I could make approximately \$2,000 per month after six months for that amount of money. He also said if I put that \$2,000 profit back into the business, then I could double the amount of profit I make.

6. I believe there was a one-page contract, but I do not recall signing anything. I paid \$10,000 to FBA Machine with my debit card, but I paid in three installments.
7. I never received any document from FBA Machine with any information substantiating their earning and profit claims contained in their profit calculator or over the phone with the sales agent. I also never received a document from FBA Machine (or any associated companies) telling me whether the company has been subject to legal action or a list of consumers who purchased their services in the past 3 years.
8. My Amazon store was supposed to open after one month, but it took over four months to open. I believe it opened in early 2024. FBA Machine ordered herbal teas, soaps, and shampoos for my store. I provided a business account that FBA Machine had access to for inventory, but the \$10,000 I spent initially was also supposed to cover inventory.
9. Jerdonna, an FBA Machine employee who worked outside the US, helped me set up my store and place orders for inventory. FBA Machine took \$1,000 out of that account to pay for an inventory order. Then I was told I had to order more inventory, but I had not made enough money back on the first order and did not want to spend more money.
10. I was asked by another employee for an additional \$3,000 for inventory, but I asked why because it was supposed to come from my initial fee. I told her I needed to think about it.
11. From the \$1,000 in inventory I ordered, FBA Machine told me that I made \$500 in sales, but I only received \$150 in profit after all the fees.
12. When I would try and talk to someone at FBA Machine, I had a hard time getting a hold of anyone. I sent emails, but I would not always receive a response. I started to think this was a scam.

13. In addition to the initial fee and inventory, I had to pay some monthly fees, including a fee for sales support software. This was supposed to be a portal I could view my store from and see the products that were ordered and sold on my store. I had a hard time getting into the program because my password was messed up.
14. I lost contact with the company about a month ago. I spent about \$15,000 total and I only made approximately \$150.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 6/30/2024, 2024
Camden, Tennessee


Bryce Wilbanks